

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Hmong College Prep Academy,

Case No: 21-cv-1721
(PAM/BRT)

Plaintiff,

vs.

DEFENDANTS'
MOTION TO DISMISS

Woodstock Capital, LLC and Clark
Reiner,

Defendants.

TO: Plaintiff Hmong College Prep Academy and its counsel of record, John T. Duffey, Maslon, LP, 3300 Wells Fargo Center, 90 South Seventh Street, Minneapolis, MN 55402-4140.

MOTION

Defendants Woodstock Capital, LLC and Clark Reiner, move the Court for an order granting dismissal, pursuant to Federal Rules of Civil Procedures 12(b)(2), 12(b)(6), 12(b)(7), 28 U.S.C. § 1406 of the claims against them asserted by Plaintiff or, alternatively, seek transfer of venue pursuant to 28 U.S.C. § 1404(b), and for such other and further relief as the Court deems just and equitable under the premises.

This motion is based upon the arguments of counsel as well as the files, records and proceedings herein, including Defendants' memoranda of law and supporting documents filed and served pursuant to the Federal Rules of Civil Procedure and the Local Rules of Court for the District Court of Minnesota.

Dated: August 11, 2021

MEYER LAW OFFICE

/s/ Mathew M. Meyer

Mathew M. Meyer (#264416)

437 4th Ave. East

Shakopee, MN 55379

Telephone: 612.741.4732

Email: Mathew@MathewMeyerLaw.com

ATTORNEY FOR DEFENDANTS

WOODSTOCK CAPITAL, LLC AND CLARK

REINER